

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor.

Case No. 19-34574-KRH

Chapter 7

**NOTICE OF APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND EXPENSE REIMBURSEMENT  
AND HEARING THEREON IF NECESSARY**

PLEASE TAKE NOTICE that the law firm of Quinn Emanuel Urquhart & Sullivan, LLP (“**Quinn Emanuel**”), special counsel to Lynn L. Tavenner, and not individually but solely in her capacity as the Chapter 7 trustee (in such capacity, the “**Chapter 7 Trustee**” and/or the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of LeClairRyan PLLC have filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “**Court**”) the following: *Fourth Interim Application of Quinn Emanuel Urquhart & Sullivan, LLP as Special Counsel to the Trustee, for Allowance of Compensation and Reimbursement of Expenses Incurred* wherein Quinn Emanuel seeks interim approval of hourly compensation in the amount of \$66,595.50,<sup>2</sup> contingency compensation in the amount of \$173,600, and reimbursement of expenses in the amount of \$62,222.58 for generally the period March 1, 2022 to June 30, 2022 (referred to herein, the “**Application**”).

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

<sup>2</sup> This amount reflects a ten (10) percent discount off of Quinn’s standard hourly rates, as stated in the Retention Application and per entry of the Retention Order as defined in the Application of Quinn Emanuel.

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**PLEASE TAKE FURTHER NOTICE** that your rights may be affected. You should read the Application carefully and discuss it with your attorney, if you have one in this Chapter 7 Case. (If you do not have an attorney, you may wish to consult one).

**PLEASE TAKE FURTHER NOTICE** on September 4, 2019, the Court entered the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF. No. 38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to pberan@tb-lawfirm.com or, for a fee, at <https://ecf.vaeb.uscourts.gov>.

**PLEASE TAKE FURTHER NOTICE** if you do not wish the Court to grant the relief requested in the Application, or if you want the Court to consider your views on the Application, then, by August 1, 2022 (the “**Objection Deadline**”), you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Applications pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will receive it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Applications as conceded and enter an appropriate order granting the requested relief without further notice or hearing.

Clerk of the Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that, if an Objection is timely filed, the Court will entertain the Applications on August 8 at 1 p.m. (or such time thereafter as the matter may be heard). In accordance with Richmond General Order 20-5, the hearing scheduled for August 1 in the LeClairRyan, PLLC Case No. 19-34574 will be conducted via Zoom with a listen-only line available via:

**Zoom registration link:**

<https://www.zoomgov.com/meeting/register/vJltd-GvqDkvH4cmJbXkjNKZZrN-Pfd4nbg>

Listen-only conference line:  
Dial: 1-866-590-5055  
Access Code: 4377075

Security Code: 32922

**PLEASE TAKE FURTHER NOTICE** that you should consult the Case Management Procedures before filing any written response.

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Dated: July 18, 2022  
Richmond, Virginia

Respectfully submitted,  
**LYNN L. TAVENNER, CHAPTER 7 TRUSTEE**

By: /s/ Erika L. Morabito  
Erika L. Morabito (VSB No. 44369)  
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*Special Counsel to Lynn L. Tavenner, Chapter 7  
Trustee*

**CERTIFICATE OF SERVICE**

Pursuant to the Local Rules of this Court and/or the Case Management Order, I certify that on this 18th day of July 2022, a true copy of the foregoing Notice was sent electronically and/or by first-class mail to: (a) the Office of the United States Trustee; (b) the Debtor's 20 Largest Unsecured Creditors; (c) all known secured creditors from the Debtor's Official Form 106D; (d) the Core Parties and 2002 List as defined in the Case Management Order; and (e) all parties requesting service of pleadings in this Case (as indicated on the Schedule A attached to the Court filed copy of this Notice).

/s/ Erika L. Morabito

Erika L. Morabito